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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

HANNAH HOLTMEIER, ALLISON COGHAN,)
and HALEY RUTSCH, on behalf of themselves)
and derivatively on behalf of KAPPA KAPPA)
GAMMA FRATERNITY,)

Plaintiffs,)

v.)

Civil Action No.: 23-CV-00051-ABJ

KAPPA KAPPA GAMMA FRATERNITY, MARY)
PAT ROONEY, MARIA BROWN, NANCY)
CAMPBELL, BARB GOETTELMAN, LIZ)
WONG, KYLE DONNELLY, BETH BLACK,)
and JANE DOES 1-4)

Defendants.)

**DEFENDANTS' STATEMENT OF NON-OPPOSITION TO FILING OF SECOND
AMENDED COMPLAINT BUT NOTING INACCURACY OF IDENTIFIED PARTIES**

Pursuant to Judge Hambrick's June 10, 2025 Order directing Defendants to state their intentions with regard to Plaintiffs' pending Motion for Leave to File a Second Amended Complaint and Judge Johnson's May 9, 2025 Order, Defendants Kappa Kappa Gamma Fraternity ("Kappa") and Mary Pat Rooney state that they do not oppose Plaintiffs being granted *leave* to file the Second Amended Complaint, but intend to file a Motion to Dismiss Plaintiffs' Second Amended Complaint pursuant to the Federal Rules of Civil Procedure.

Defendants Kappa and Rooney note that the Second Amended Complaint adds additional Defendants and it does not appear that those Defendants have been served. Additionally, at this time, undersigned counsel has not been retained to represent the new Defendants in this matter. Therefore, at this time, counsel makes no representations on the behalf of the newly added Defendants.

Finally, counsel notes that none of the following are current members of Fraternity Council: Mary Pat Rooney, Maria Brown, and Liz Wong. Plaintiffs' counsel was previously notified that in June 2024 new Fraternity Council were elected. Beth Black is also not the Panhellenic Delegate. Therefore, the captions on the Second Amended Complaint identifying individuals as Officers and members of Fraternity Council and the Panhellenic Delegate are inaccurate.

Dated: June 11, 2025

Respectfully submitted,

/s/ Natalie M. McLaughlin

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*Attorneys for Defendants Kappa Kappa Gamma
Fraternity and Mary Pat Rooney*

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission and electronic mail this 11th day of June, 2025.

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/s/ Brian W. Dressel

Brian W. Dressel